#### Remarks

Reconsideration of the application is respectfully requested in view of the foregoing amendments and following remarks. Claims 1-5 and 35-46 are pending in the application. No claims have been allowed. Claims 6-10 are canceled without prejudice. Claims 1 and 40 are independent.

### Amendment to Specification

The amendment to the specification has been made to correct a typographical error and make the brief description of Figure 3 consistent with the text in Figure 3. No new matter has been added.

# Response to § 103(a) Rejections

The Action rejects claims 1-5 and 35-46 under 35 U.S.C. § 103(a). Applicants respectfully traverse these rejections.

To establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. In addition, the prior art reference (or references when combined) must teach or suggest all the claim limitations. (*See* MPEP § 2142.) Motivations to combine or modify references must come from the references themselves or be within the body of knowledge in the art. (*See* MPEP § 2143.01.)

Applicants respectfully submit that the claims in their present form are allowable over the applied art, as explained in detail below.

#### A. Rejection of Claims 1-3, 5, 35, 39-41, 45 and 46

In the Action, the Office rejects claims 1-3, 5, 35, 39-41, 45 and 46 under § 103(a) in view of U.S. Patent Application Publication No. 2004/0190771 (Eid et al.). Applicants respectfully traverse these rejections.

Claims 1-5, 35 and 39

As amended, independent claim 1 recites in part:

the n-bit representation comprising a 16-bit fixed-point block of data for the pixel, where the most significant byte in the 16-bit unit of data is an integer component, where the least significant byte in the 16-bit unit of data is a fractional component, and where the n-bit representation is convertible to a lower-precision representation by assigning zero values to one or more of the bits in the least significant byte while the most significant byte is unchanged.

[Emphasis added.] The Action indicates that claim 1 is obvious in view of Eid. [See Action at pp. 4-5.] Applicants respectfully disagree.

The Action states at pages 4-5, "Regarding claim 1, Eid teaches . . . the n-bit representation is convertible to a lower-precision representation by assigning zero values to one or more of the bits in the least significant byte." The Action cites paragraph 0023, lines 4-6 of Eid and states that "shifting corresponds to assigning zero values; shifted by 6 bits corresponds to assigning zero values to one or more of the bits in the least significant byte."

Applicants respectfully disagree that Eid teaches the cited language of amended claim 1. At paragraph 0023, lines 4-6, Eid states, "The 16-bit integer then is shifted by 6 bits to obtain a 10-bit value." Thus, Eid describes changing a 16-bit *integer* to a 10-bit value, and does not describe converting an "n-bit representation comprising a 16-bit fixed-point block of data for the pixel, where the most significant byte in the 16-bit unit of data is an integer component, where the least significant byte in the 16-bit unit of data is a fractional component," as recited in claim 1. Furthermore, when a "16-bit integer then is shifted by 6 bits to obtain a 10-bit value," as described in Eid, the values in the bits of the most significant byte are shifted over, as are the values of the other bits in the 16-bit integer. Therefore, Eid does not teach or suggest "assigning zero values to one or more of the bits in the least significant byte while the most significant byte is unchanged," as recited in amended claim 1.

Even if Eid's shifting of a 16-bit integer could be modified to assign "zero values to one or more of the bits in the least significant byte while the most significant byte is unchanged," as recited in claim 1, Eid would be assigning zero values to bits of a 16-bit integer, not bits of a fractional component. In contrast to Eid, the integer component in claim 1 is not changed. For example, the application states at page 15, "Described 10- and 16-bit formats are advantageous

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because the data is most-significant-bit justified (i.e. the upper 8 bits always correspond to the 'integer' portion of the original fraction)."

Claim 1 is allowable. Claims 2-5, 35 and 39 depend from claim 1 and should be allowable for at least the reasons given above in support of claim 1. Therefore, the rejections of claims 1-5, 35 and 39 under 35 U.S.C. § 103(a) should be withdrawn. Such action is respectfully requested.

Dependent claims 36-38 are also allowable. The rejections of dependent claims 36-38 are addressed below.

#### Claims 40, 41, 45 and 46

As amended, independent claim 40 recites in part:

the n-bit representation comprising a 16-bit fixed-point block of data for the pixel, where the most significant byte in the 16-bit unit of data is an integer component, where the least significant byte in the 16-bit unit of data is a fractional component, and where the n-bit representation is convertible to a lower-precision representation by assigning zero values to one or more of the bits in the least significant byte while the most significant byte is unchanged.

[Emphasis added.] The Action indicates that claim 40 is obvious in view of Eid. [See Action at pp. 4-5.] Applicants respectfully disagree.

The Action states at pages 7-8, "Regarding claim 1, Eid teaches . . . the n-bit representation is convertible to a lower-precision representation by assigning zero values to one or more of the bits in the least significant byte." The Action cites paragraph 0023, lines 4-6 of Eid and states that "shifting corresponds to assigning zero values; shifted by 6 bits corresponds to assigning zero values to one or more of the bits in the least significant byte."

Applicants respectfully disagree that Eid teaches the cited language of amended claim 40. Eid describes changing a 16-bit *integer* to a 10-bit value, and does not describe converting an "n-bit representation comprising a 16-bit fixed-point block of data for the pixel, where the most significant byte in the 16-bit unit of data is an integer component, where the least significant byte in the 16-bit unit of data is a fractional component," as recited in claim 40. Furthermore, when a "16-bit integer then is shifted by 6 bits to obtain a 10-bit value," as described in Eid, the values in the bits of the most significant byte are shifted over, as are the values of the other bits in the 16-bit integer. Therefore, Eid does not teach or suggest "assigning zero values to one or more of

the bits in the least significant byte while the most significant byte is unchanged," as recited in amended claim 40.

Even if Eid could be modified to assign "zero values to one or more of the bits in the least significant byte while the most significant byte is unchanged," as recited in claim 40, Eid would be assigning zero values to bits of a 16-bit integer, not bits of a fractional component. In contrast to Eid, the integer component in claim 40 is not changed. For example, the application states at page 15, "Described 10- and 16-bit formats are advantageous because the data is most-significant-bit justified (i.e. the upper 8 bits always correspond to the 'integer' portion of the original fraction)."

Claim 40 is allowable. Claims 41, 45 and 46 depend from claim 40 and should be allowable for at least the reasons given above in support of claim 40. Therefore, the rejections of claims 40, 41, 45 and 46 under 35 U.S.C. § 103(a) should be withdrawn. Such action is respectfully requested.

Dependent claims 42-44 are also allowable. The rejections of dependent claims 42-44 are addressed below.

### B. Rejection of Claim 4

In the Action, the Office rejects claim 4 under § 103(a) in view of Eid and U.S. Patent Application Publication No. 2004/0183949 (Lundberg et al.). Applicants respectfully traverse these rejections.

The applied art does not teach or suggest each and every element of dependent claim 4. Lundberg describes "the colour information in each picture is sampled at lower spatial resolution than the luminance." [See Lundberg at ¶ 0073.] However, the applied art does not teach or suggest the recited language of independent claim 1.

Because the applied art does not teach or suggest at least one element of independent claim 1, claim 4 is allowable at least for the reasons given above for the allowability of its parent claim. Therefore, the rejection of claim 4 under 35 U.S.C. § 103(a) should be withdrawn. Such action is respectfully requested.

## C. Rejections of Claims 38 and 44

In the Action, the Office rejects claims 38 and 44 under § 103(a) in view of Eid and "FOURCC.org – YUV pixel formats," http://www.fourcc.org/yuv.php, pp. 1-15 ("the FOURCC.org YUV pixel formats document"). Applicants respectfully traverse these rejections.

The applied art does not teach or suggest each and every element of dependent claim 38. The FOURCC.org YUV pixel formats document describes packed YUV formats with different numbers of bits per pixel, but the applied art does not teach or suggest the recited language of independent claim 1. In addition, the web page at http://www.fourcc.org/yuv.php cited by Applicants in the IDS filed on March 10, 2004, indicates a "last modified" date of February 7, 2004. Applicants do not agree that this document is prior art to the present application and reserve the right to provide evidence of prior conception.

Because the applied art does not teach or suggest at least one element of independent claim 1, claim 38 is allowable at least for the reasons given above for the allowability of its parent claim. Therefore, the rejection of claim 38 under 35 U.S.C. § 103(a) should be withdrawn. Such action is respectfully requested.

The applied art also does not teach or suggest the recited language of independent claim 40. Because the applied art does not teach or suggest at least one element of independent claim 40, claim 44 is allowable at least for the reasons given above for the allowability of its parent claim. Therefore, the rejection of claim 44 under 35 U.S.C. § 103(a) should be withdrawn. Such action is respectfully requested.

### D. Rejections of Claims 36, 37, 42 and 43

In the Action, the Office rejects claims 36, 37, 42 and 43 under § 103(a) in view of Eid and U.S. Patent Application Publication No. 2003/0202589 (Reitmeier et al.). Applicants respectfully traverse these rejections.

The applied art does not teach or suggest each and every element of dependent claim 36 and 37. Reitmeier describes a "10-bit video signal is coupled to a video processor (not shown) for further processing." [See Reitmeier at ¶ 0033.] However, the applied art does not teach or suggest the recited language of independent claim 1.

Because the applied art does not teach or suggest at least one element of independent claim 1, claims 36 and 37 are allowable at least for the reasons given above for the allowability

of their parent claim. Therefore, the rejection of claims 36 and 37 under 35 U.S.C. § 103(a) should be withdrawn. Such action is respectfully requested.

The applied art also does not teach or suggest the recited language of independent claim 40. Because the applied art does not teach or suggest at least one element of independent claim 40, claims 42 and 43 are allowable at least for the reasons given above for the allowability of their parent claim. Therefore, the rejection of claims 42 and 43 under 35 U.S.C. § 103(a) should be withdrawn. Such action is respectfully requested.

### Request For Interview

If any issues remain, the Examiner is formally requested to contact the undersigned attorney prior to issuance of the next Office Action in order to arrange a telephonic interview. It is believed that a brief discussion of the merits of the present application may expedite prosecution. Applicants submit the foregoing formal Amendment so that the Examiner may fully evaluate Applicants' position, thereby enabling the interview to be more focused.

This request is being submitted under MPEP § 713.01, which indicates that an interview may be arranged in advance by a written request.

### Conclusion

The claims in their present form should now be allowable. Such action is respectfully requested.

Respectfully submitted,

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